

Plaintiffs' Ex. 7

Re: Harris - LT re resolution of NW discovery dispute

Kelly Clarke <KellyC@legalaidnc.org>

Tue 8/30/2022 2:38 PM

To: Spencer Beard <Spencer.Beard@mgclaw.com>; Christopher Brancart <cbrancart@brancart.com>; Luke Dalton <Luke.Dalton@mgclaw.com>

Cc: Ayanda Meachem <AyandaM@legalaidnc.org>; Luis Pinto <LuisP@legalaidnc.org>

Ok. Thanks for letting me know, Spencer.

Kelly Clarke

Co-Director/Managing Attorney

Legal Aid of North Carolina, Inc. - Fair Housing Project

2101 Angier Avenue, Suite 300

Durham, NC 27703

919.865.3825 (voice)

919.861.1887 (fax)

Pronouns: she/ her/ hers

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From: Spencer Beard <Spencer.Beard@mgclaw.com>

Sent: Tuesday, August 30, 2022 2:22 PM

To: Kelly Clarke <KellyC@legalaidnc.org>; Christopher Brancart <cbrancart@brancart.com>; Luke Dalton <Luke.Dalton@mgclaw.com>

Cc: Ayanda Meachem <AyandaM@legalaidnc.org>; Luis Pinto <LuisP@legalaidnc.org>

Subject: RE: Harris - LT re resolution of NW discovery dispute

Thanks Kelly,

Sorry for the delay. I have been in, and am still in, depositions today.

I can't agree to this plan.



Spencer Beard, Attorney

spencer.beard@mgclaw.com

1001 Military Cutoff Road, Ste 310

Wilmington, NC 28405

Main:910-726-1122 | Direct:910-726-1610 | Fax:910-920-9157

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From: Kelly Clarke <KellyC@legalaidnc.org>

Sent: Monday, August 29, 2022 3:57 PM

To: Spencer Beard <Spencer.Beard@mgclaw.com>; Christopher Brancart <cbrancart@brancart.com>; Luke Dalton <Luke.Dalton@mgclaw.com>

Cc: Ayanda Meachem <AyandaM@legalaidnc.org>; Luis Pinto <LuisP@legalaidnc.org>

Subject: Re: Harris - LT re resolution of NW discovery dispute

Hey Spencer:

Given where we are now in the case and the motion to compel deadline of September 1, would your clients be agreeable to reconsider submitting to plaintiffs the net worth information previously requested in discovery?

I know it has been awhile since the below email exchange but it appeared the #3 option Chris proposed in his letter dated December 20, 2020 (also attached) might work for your client?

If an exchange of net worth information is a possibility, we would ask for the parties to file a stipulation with the court on or before September 1 - asking for a two-week extension to file the motion to compel, with NW information requested in the previous discovery being exchanged by 5pm on September 8, 2022.

Please let us know by tomorrow, August 30th by 5pm if this arrangement or proposed plan works.

Thanks, Spencer.

Sincerely,
Kelly

Kelly Clarke
Co-Director/Managing Attorney
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From: Spencer Beard <Spencer.Beard@mgclaw.com>
Sent: Tuesday, December 29, 2020 11:02 AM
To: Kelly Clarke <KellyC@legalaidnc.org>; Christopher Brancart <cbrancart@brancart.com>; A. Ruthie Sheets <ars@hcwb.net>; J.B. Dupree <jaybdupree@gmail.com>; Jay Salsman <jcs@hcwb.net>; Luke Dalton <Luke.Dalton@mgclaw.com>
Cc: Ayanda Meachem <AyandaM@legalaidnc.org>; Luis Pinto <LuisP@legalaidnc.org>; Matthew Dahl <sdupree@brancart.com>
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This confirms that as to Remco and Bishop, plaintiffs' duty to confer has been exhausted.

As to the 4 options presented as possible paths to be taken by plaintiffs, I can say, without waiving anything or

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